3. ENVIRONMENTAL PROTECTION AGE
REGION IV, ATHENS, GEORGIA

MEMORANDUM

DATE: AUG 02 1990

SUBJECT: Document Review: Draft Phase II Remedial Investigation/Reasibility

Study Work Plan, Medley Farm, Gaffney, South Carolina

ESD Project No. 90E-523

FROM: Jonathan Vail, Hydrogeologist

Hazardous Waste Section

Environmental Compliance Branch Environmental Services Division

TO: Jon K. Bornholm, RPM

South Carolina Remedial Section North Superfund Remedial Branch

Waste Management Division

THRU: M. R. Carter, P.E., Acting Chief

Hazardous Waste Section

Environmental Compliance Branch Environmental Services Division

AUG 7 1990

ATLANTA, GA.

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The review of the subject document has been completed as requested. I am not aware of any responses to my previous comments on the Phase I report . However, after looking at the document it is clear that some of my previous comments were addressed to your satisfaction. Based on the review of the subject document, I have the following comments:

- Section 1.3, p. 6. Comparing site specific levels of inorganic constituents to non-site specific levels found in a published report is obviously not going to play any part in the decisions made on any site. Therefore the use of published reports on inorganic constituents that are not site specific will never be considered as an indication of whether or not background levels have been attained. It is best to not reference such information (Table 2.4 and 2.5) so the reader will not be confused to believe that the site specific levels are within background.
- Table 2.2, p. 12, Section 2.3.2, p. 15. The results of analysis
 of filtered samples is not accepted for the determination of site
 specific ground water constituents. Decisions made on any site
 are based on the results of non-filtered sample analyses.
- Section 2.4, p. 19. The exact decontamination procedures to be used should be restated here. The POP (January 1989) was never changed to reflect the use of organic-free water after the solvent rinse. If no organic-free water is available, the equipment should be allowed to air dry as long as possible. Also, steam cleaning only for drilling equipment and well materials is not an acceptable practice for decontamination. This was pointed out several times in comments made on the POP.

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• Section 4.0. A bedrock well should be installed near SW-3 and a shallow well should probably be installed approximately halfway between SW-3 and SW-4. The bedrock well proposed near SW-4 appears appropriate.

The issue of background water quality should be addressed with regards to inorganic constituents. Also, the issue of whether or not the Sprouse well is located up or down gradient should be determined, if possible, from water level measurements from the Sprouse well.

If you have any questions or comments, please call FTS 250-3391.

cc: Finger/Wright Carter/Bokey Knight